

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

CASE NO. 7:20-CV-00947-DCC

Plaintiffs,

v.

COLLINS MURPHY et al.,

Defendants.

JANE DOE,

CASE NO. 7:21-CV-03193-DCC

Plaintiff,

v.

COLLINS MURPHY et al.,

Defendants.

**JOINT STIPULATION REGARDING INDEPENDENT MENTAL EXAMINATIONS
(FED. R. CIV. P. 35)**

WHEREAS on March 11, 2024, counsel for Defendants MG Freesites and MindGeek S.A.R.L. (“Defendants”) and counsel for Plaintiffs participated in an informal conference with the Court on the topic of independent mental examinations (“IMEs”) pursuant to Federal Rule of Civil Procedure 35;

WHEREAS Plaintiffs’ depositions will be completed by April 26, 2024;

NOW, THEREFORE, IT IS HEREBY AGREED TO AND STIPULATED by and between Plaintiffs and Defendants (collectively the “Parties”) as follows:

1. The Parties reserve all arguments in support of and against IMEs. The Parties will revisit their positions on IMEs, in good faith, following Plaintiffs’ depositions.

2. By May 10, 2024, the Parties will meet and confer on all remaining issues relating to the IMEs, including but not limited to (a) whether an IME is proper for each Plaintiff, and (b) what tests (if any) may be performed for each Plaintiff.

3. By May 15, 2024, Defendants will file any necessary motion regarding IMEs, including but not limited to a motion to compel IMEs or a motion regarding the scope of the IMEs.

4. By May 22, 2024, Plaintiffs will file their opposition to the aforementioned motion.

5. By May 29, 2024, Defendants will file their reply in support of the aforementioned motion.

6. As recognized by the Court during the informal conference on March 11, 2024, the Parties agree to cooperate on scheduling the IMEs, to the extent IMEs are agreed upon by the Parties or ordered by the Court.

7. Further, the Parties agree that any IMEs agreed upon by the Parties or ordered by the Court may be conducted after the May 31, 2024 discovery cutoff.

SIGNATURE PAGE TO FOLLOW

DATED: March 20, 2024

Respectfully submitted,

WE CONSENT:

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